

## STATEMENT OF BASIS (AI No. 12184)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0105121 to discharge to waters of the State of Louisiana.

**THE APPLICANT IS:** Wyesco, Inc.  
Post Office Box 266  
Zachary, Louisiana 70791

**ISSUING OFFICE:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313

**PREPARED BY:** Michelle Bickham

**DATE PREPARED:** July 23, 2009

### 1. PERMIT STATUS

#### A. Reason For Permit Action:

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term

B. LPDES permits – LA0105121  
LPDES permit effective date: August 1, 2004  
LPDES permit expiration date: July 31, 2009

C. Date Application Received: January 30, 2009

### 2. FACILITY INFORMATION

#### A. FACILITY TYPE/ACTIVITY - industrial machine shop

Wyesco Inc. is an existing industrial machine shop that cleans parts from pumps and other rotating components. Once cleaned, the equipment is assembled.

#### B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: I
3. Wastewater Type: II
4. SIC code: 7699

C. LOCATION - 222 Highway 19, Slaughter, East Feliciana Parish  
Latitude 30° 42' 37", Longitude 91° 08' 42"

Statement of Basis for  
Wyesco, Inc.  
LA0105121, AI No. 12184  
Page 2

### 3. OUTFALL INFORMATION

#### Outfall 001

Discharge Type: equipment washwater and stormwater runoff  
Treatment: none  
Location: at the point of discharge from the equipment wash area on the north side of the facility  
Flow: 60 gpd  
Discharge Route: local drainage thence to Doyle Bayou

\*\*Sanitary discharge goes into absorption field lines.

### 4. RECEIVING WATERS

STREAM - local drainage thence to Doyle Bayou

BASIN AND SEGMENT - Lake Pontchartrain Basin, Segment 040102

DESIGNATED USES - a. primary contact recreation  
b. secondary contact recreation  
c. propagation of fish and wildlife  
g. outstanding natural resources\*

\*\*As per LAC33:IX.1111.A, this use designation shall apply only to listed water bodies and not to their tributaries or distributaries unless so specified. The discharge from this facility does not go directly to the listed water body.

### 5. TMDL STATUS

Subsegment 040102 is listed on LDEQ's Final 2006 303(d) List as impaired for pathogen indicators. To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Lake Pontchartrain Basin, those suspected causes for impairment which are not directly attributed to the industrial machine shop point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated. There are no suspected causes left after these eliminations.

### 6. CHANGES FROM PREVIOUS PERMIT

No changes were made from the previous permit.

### 7. COMPLIANCE HISTORY/COMMENTS

There have been no recent water inspections at the facility. However, several air incidents have been reported in the last few years. The last air inspection report (11/14/08) stated that an additional air curtain had been installed to prevent further problems as far as sand blasting at the facility.

Statement of Basis for  
Wyesco, Inc.  
LA0105121, AI No. 12184  
Page 3

DMR Review/Excursions –

There were no DMR's found in EDMS. The facility was contacted and subsequently submitted DMR's from January 2007 to the present. DMR's were reviewed for the period of 6/07 – 6/09. These have been forwarded to the Office of Environmental Compliance. The excursions are as follows:

Date	Parameter	Outfall	Reported Value	Permit Limits
6/08	COD	001	222 mg/L	125 mg/L
5/08	COD	001	179 mg/L	125 mg/L
3/08	COD	001	332 mg/L	125 mg/L

8. EXISTING EFFLUENT LIMITS

Outfall 001 – equipment washwater and stormwater runoff

Parameter	LPDES	
	Monthly Average	Daily Maximum
Flow - gpd	Report monthly Est.	Report monthly Est.
TSS	---	45 mg/L monthly Grab
COD	---	125 mg/L monthly Grab
Oil and Grease	---	15 mg/L monthly Grab
Soaps & Detergents	---	Report monthly Grab
pH	6.0 - 9.0 s.u. monthly Grab	
Oil & Grease, Visible	---	No Presence daily Grab

**Statement of Basis for**

Wyescos, Inc.

LA0105121, AI No. 12184

Page 4

**9. ENDANGERED SPECIES**

The receiving waterbody, Subsegment 040102 of the Lake Pontchartrain Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Gulf Sturgeon, which is listed as threatened and/or endangered species. This draft permit has been submitted to the FWS for review in accordance with a letter dated 11/17/08 from Rieck (FWS) to Nolan (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and after consultation with FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the Gulf Sturgeon. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

**10. HISTORIC SITES**

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

**11. TENTATIVE DETERMINATION**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

**12. PUBLIC NOTICES**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

Statement of Basis for  
Wyesco, Inc.  
LA0105121, AI No. 12184  
Page 5

### Rationale for Wyesco, Inc.

#### 1. Outfall 001 - equipment washwater and stormwater runoff (estimated flow is 60 gpd)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	mg/L		
Flow	Report	Report	
COD	---	125	Similar discharges*, LAG480000 (BPJ)
TSS	---	45	Similar discharges*, LAG480000 (BPJ)
Oil & Grease	---	15	Similar discharges*, LAG480000 (BPJ)
Soaps & Detergents	Inventory Record	---	Similar discharges*, LAG480000 (BPJ)
Oil & Grease, Visual	---	No Presence	Similar discharges*, LAG480000 (BPJ)
pH, s.u.	6.0 (min)	9.0 (max)	Similar discharges*, LAG480000 (BPJ)

**Treatment:** none

**Monitoring Frequency:** daily for Oil and Grease, Visual and monthly for flow, TSS, COD, oil and grease, and pH at the point of discharge from the equipment washdown area prior to mixing with other waters. Soaps and Detergents: document in a monthly inventory record the quantity and type of any Soap and/or Detergent used during each calendar month.

**Limits Justification:** Limits and monitoring frequencies are based on current guidance for similar discharges from other facilities, the previous permit, and the Light Commercial General Permit, LAG480000 effective August 1, 2001.

Note: EPA Guidelines for Metal Products & Machinery (40 CFR Part 438) are applicable; however, more stringent state requirements for exterior equipment washwater are being placed in the permit.

\* Existing permits for similar outfalls  
BPJ Best Professional Judgement  
su Standard Units

#### NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

#### STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

As per LAC 33:IX.2511.B.14.a-k, storm water discharges from facilities classified as SIC code 7699 are not considered to be associated with industrial activities. Therefore, an SWP3 is not included in the permit.